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April 18, 2008

Marlene H. Dortch  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW-B204  
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service  
CC Docket No. 96-45 and WC Docket No. 05-337

Madam Secretary:

On behalf of MTPCS, LLC d/b/a Chinook Wireless (“Chinook”), we hereby submit the attached letter to serve as initial comments in response to the Commission’s recent *Notices of Proposed Rulemaking* (“NPRMs”) regarding the high-cost universal service support program.<sup>1</sup> The letter was initially submitted on February 22, 2008, and directly concerns the issues addressed in the FCC’s NPRMs. Therefore, in lieu of comments, we ask that the Commission consider the attached letter as part of the comment cycle established for the NPRMs.

Sincerely,



David LaFuria  
Steven Chernoff  
Counsel for MTPCS, LLC d/b/a Chinook Wireless

Enclosure

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<sup>1</sup> See *Comment Cycle Established for Commission’s Notices of Proposed Rulemaking Regarding the Identical Support Rule, the Use of Reverse Auctions to Set High-Cost Universal Service Support, and the Federal-State Joint Board on Universal Service’s Recommendations for Comprehensive Reform of High-Cost Universal Service Support*, WC Docket No. 05-337, CC Docket No. 96-45, FCC Public Notice, DA 08-499 (rel. Mar. 4, 2008) (providing that comments are due April 3, 2008, and reply comments are due May 5, 2008, and indicating that “parties may file consolidated comments . . . in response to the three Notices”); *High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, WC Docket No. 05-337, CC Docket No. 96-45, *Order*, DA 08-674 (Wireline Comp. Bur., rel. Mar. 24, 2008) (revising the pleading cycle to provide that comments are due April 17, 2008, and reply comments are due May 19, 2008).